

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

DEC 02 2020

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY KMT, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JORGE LUIS VILLARREAL,
RICHARD CLINTON POND, and
CORY LEE JUMP,

Defendants.

No.

CR 20-317SLP

Violations: 18 U.S.C. § 371
18 U.S.C. § 922(a)(1)(A)
18 U.S.C. § 924(a)(6)
18 U.S.C. § 924(n)
18 U.S.C. § 922(a)(5)
18 U.S.C. § 1001(a)(2)
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Conspiracy to Deal Firearms Without a License)

From on or about March 23, 2020, through on or about October 31, 2020, within
the Western District of Oklahoma and elsewhere,

----- **JORGE LUIS VILLARREAL,**
RICHARD CLINTON POND, and
CORY LEE JUMP, -----

knowingly combined, conspired, confederated, and interdependently agreed with each
other and others, both known and unknown to the Grand Jury, to violate Title 18, United
States Code, Section 922(a)(1)(A), which prohibits individuals from engaging in the
business of dealing firearms without being licensed as an importer, manufacturer, or dealer.

Objective of the Conspiracy

The object of the conspiracy was to obtain firearms and sell them for a profit without first being licensed as an importer, manufacturer, or dealer.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the conspirators committed the following overt acts, among others:

1. During the time period of the conspiracy, **RICHARD CLINTON POND** purchased firearms online and had them shipped to a Federal Firearms Licensed (“FFL”) dealer located in Shawnee, Oklahoma.

2. When the firearms arrived at the FFL dealer, **RICHARD CLINTON POND** paid a transfer fee and completed the ATF Form 4473, claiming that he was the actual purchaser of the firearms when, in fact, he was obtaining the firearms with the intent to sell them to **JORGE LUIS VILLARREAL** for profit.

3. During the time period of the conspiracy, **CORY LEE JUMP** obtained firearms online, often from Armslist.com, with the intent to sell them to **JORGE LUIS VILLARREAL** for profit.

4. During the time period of the conspiracy, **JORGE LUIS VILLARREAL** traveled from Pharr, Texas, to Oklahoma City, Oklahoma, to purchase firearms from **RICHARD CLINTON POND** and **CORY LEE JUMP**.

5. During the time period of the conspiracy, **JORGE LUIS VILLARREAL** transported the firearms obtained from **RICHARD CLINTON POND** and **CORY LEE**

JUMP from Oklahoma City, Oklahoma, to Texas and Mexico, where he would sell the firearms to others for profit.

6. During the time period of the conspiracy, at the request of **JORGE LUIS VILLARREAL**, **RICHARD CLINTON POND** would send lists of firearms available for sale to **JORGE LUIS VILLARREAL**, using both text messages and email.

7. During the time period of the conspiracy, **JORGE LUIS VILLARREAL** directed **RICHARD CLINTON POND** to give **COREY LEE JUMP** \$4,100 in United States currency in exchange for thirteen (13) firearms and one (1) rifle. Soon thereafter, the firearms were delivered to **JORGE LUIS VILLARREAL**.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
(Unlawful Dealing in Firearms)

On or about May 14, 2020, within the Western District of Oklahoma,

----- **CORY LEE JUMP**, -----
not being a licensed dealer of firearms as described in Title 18, United States Code, Section 923, did willfully engage in the business of dealing in firearms.

All in violation of Title 18, United States Code, Section 922(a)(1)(A), the penalty for which is found at Title 18, United States Code, Section 924(a)(1)(D).

COUNT 3
(False Statement in Acquisition of a Firearm)

On or about August 21, 2020, within the Western District of Oklahoma,

----- **RICHARD CLINTON POND**, -----
in connection with the acquisition of two firearms from 102 Pawn, a licensed dealer of

firearms within the meaning of Chapter 44 of Title 18, United States Code, did knowingly make a false and fictitious written statement to 102 Pawn, which statement was intended to deceive 102 Pawn as to a fact material to the lawfulness of such transfer of said firearms to **RICHARD CLINTON POND** under Chapter 44 of Title 18, United States Code, in that **RICHARD CLINTON POND** stated that he was the actual transferee/buyer of the firearms, when in fact, as **RICHARD CLINTON POND** then knew he was acquiring the firearms on behalf of another person.

All in violation of Title 18, United States Code, Section 922(a)(6), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 4
(Traveling Interstate to Deal Firearms Without a License)

On or about September 18, 2020, within the Western District of Oklahoma and elsewhere,

----- **JORGE LUIS VILLARREAL**, -----

with the intent to engage in conduct that constitutes a violation of Title 18, United States Code, Section 922(a)(1)(A) (dealing in firearms without a license), traveled from Texas into Oklahoma and acquired or attempted to acquire multiple firearms in furtherance of dealing firearms without a license.

All in violation of Title 18, United States Code, Section 924(n).

COUNT 5
(Unlawful Sale of Firearm to an Out-of-State Resident)

On or about September 18, 2020, within the Western District of Oklahoma,

----- **RICHARD CLINTON POND**, -----

not being a licensed importer, licensed manufacturer, licensed dealer, and licensed collector of firearms, did willfully sell, transfer, and deliver multiple firearms to a person other than a licensed importer, licensed manufacturer, licensed, and licensed collector of firearms, knowing and with reasonable cause to believe that said person was not then residing in the state of Oklahoma, the state in which the defendant was residing at the time of the aforesaid sale, transfer, and delivery of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(5), the penalty for which is found at Title 18, United States Code, Section 924(a)(1)(D).

COUNT 6

(False Statement or Representation to an Agency of the United States)

On or about October 21, 2020, within the Western District of Oklahoma,

----- **CORY LEE JUMP** -----

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation within the jurisdiction of the executive branch of the Government of the United States by informing SA Jared Lowe, ATF, during an interview at his place of business, 601 Westland Drive, Edmond, Oklahoma, that he had sold two firearms at one time but never any more than two. The statements and representations were false because, as **CORY LEE JUMP** then and there knew, he had previously sold fourteen firearms to **RICHARD CLINTON POND** on behalf of **JORGE LUIS VILLARREAL** in a single transaction.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 7
(Traveling Interstate to Deal Firearms Without a License)

On or about October 31, 2020, within the Western District of Oklahoma and elsewhere,

----- **JORGE LUIS VILLARREAL**, -----

with the intent to engage in conduct that constitutes a violation of 18 U.S.C. § 922(a)(1)(A) (dealing in firearms without a license), traveled from Texas into Oklahoma and acquired or attempted to acquire multiple firearms in furtherance of dealing firearms without a license.

All in violation of Title 18, United States Code, Section 924(n).

FORFEITURE

A. The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

B. Upon conviction of any of the offenses alleged in Counts 1, 2, 3, 4, 5, and 7 of this Indictment, **JORGE LUIS VILLARREAL**, **RICHARD CLINTON POND**, and **CORY LEE JUMP** shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offense(s).

The property subject to forfeiture includes, but is not limited to, the following firearms:

1. Hi-point, model C, 9mm caliber pistol, bearing serial number P204734;
2. Rock Island Armory (Armscor), model TCM9R, .22 caliber pistol, bearing serial number AC185536;

3. Glock GmbH, model 19X, 9mm caliber pistol, bearing serial number BGRP933;
4. Glock GmbH, model 20C, 10mm caliber pistol, bearing serial number SGH900;
5. Glock GmbH, model 23, .40 caliber pistol, bearing serial number PXP691;
6. Springfield Armory, model XDM-10, 10mm caliber pistol, bearing serial number AT223499;
7. Springfield Armory, model XDM-10, 10mm caliber pistol, bearing serial number AT168456;
8. Fabrique National (FN), model 509, 9mm caliber pistol, bearing serial number GKS0008468;
9. Glock GmbH, model 17, 9mm caliber pistol, bearing serial number DD495US;
10. Hi-Point, model JCP, .40 caliber pistol, bearing serial number X7277158;
11. Heckler & Koch, model VP9SK, 9mm caliber pistol, bearing serial number 232-027924;
12. Palmetto State Armory, model PSAK47, 7.62 x 39mm caliber rifle, bearing serial number AKB019042;
13. Palmetto State Armory, model AK-P7, 7.62 x 39mm caliber rifle, bearing serial number P7-001449;
14. Savage, model Rascal, .22 caliber pistol, bearing serial number 3313819;
15. Sig Sauer, model Sig 716, 7.62 x 39mm caliber rifle, bearing serial number 22C014425;
16. Palmetto State Armory, model PG9, 9mm caliber pistol, bearing serial number PS9G005350;
17. Waffen Werks, model AK-74, 7.62 x 39mm caliber rifle, bearing serial number WW02630;

18. Mossberg, model 930, 12 gauge shotgun, bearing serial number AF156566;
19. Linyi Junxing (Norinco DDI), model Cheetah, 12 gauge shotgun, bearing serial number 0015230126003482;
20. Smith & Wesson, model M&P 15-22, .22 caliber pistol, bearing serial number DFK9745;
21. Remington, model 597, .22 caliber rifle, bearing serial number D2931554;
22. Rock Island Armory (Armscor), model M5, 12 gauge shotgun, bearing serial number RIA1669603;
23. Henry Repeating Arms, model H001, .22 caliber rifle, bearing serial number 945813H;
24. Canik55, model TP9 Elite SG, 9mm caliber pistol, bearing serial number T6472-20 BN08777;
25. CZ, model P-10 C, 9mm caliber pistol, bearing serial number C750232;
26. CZ, model P-10 S, 9mm caliber pistol, bearing serial number UC04084;
27. Canik55, TP9 Elite SG, 9mm caliber pistol, bearing serial number T6472-20CB22128;
28. Sarsilmaz (SAR arms), Sar 9, 9mm caliber pistol, bearing serial number T1102-20BV60000;
29. Sarsilmaz (SAR Arms), Sar 9, 9mm caliber pistol, bearing serial number T1102-20BV60001;
30. Sarsilmaz (SAR Arms), Sar 9, 9mm caliber pistol, bearing serial number T1102-20BV60006;
31. Springfield Armory, model XD9 Elite, 9mm caliber pistol, bearing serial number AT239147;
32. Tavor, model X95, 5.56mm rifle, bearing serial number T0077076;
33. Fabrique National (FN), model FNX 40, .40 caliber pistol, bearing serial number FX20039973;

34. CZ, model CZ-75 P-01, 9mm caliber pistol, bearing serial number FF9W96;
35. Franklin Armory, Lower Receiver, "Pistol", bearing serial number P-13057;
36. Kriss, model Vector, 9mm caliber rifle, bearing serial number 919P009005;
37. Kel-Tec, model Sub 2000, 9mm caliber rifle, bearing serial number FF9W96;
38. Palmetto State Armory, model AKV, 9mm caliber pistol, bearing serial number AKV001716;
39. Dickinson Kamando, model XX2d-M-2, 12 gauge shotgun, bearing serial number 203313343;
40. Marlin, model 1894, .44 caliber rifle, bearing serial number MR49818I;
41. Hi-Point, model 4095, .40 caliber pistol, bearing serial number H82438;
42. Palmetto State Armory, Lower Receiver, PA-15, bearing serial number SCD800752;
43. Springfield Armory, model XDM Elite, 9mm caliber pistol, bearing serial number AT291414;
44. Kel-Tec, model P17, .22LR caliber pistol, bearing serial number g0f79;
45. Arsenal Firearms, model IT-14, 9mm caliber pistol, bearing serial number AF1497A;
46. STI, Staccato C, 9mm caliber pistol, bearing serial number EH1775;
47. Springfield Armory, model Saint Edge, Multi, bearing serial number SE77780;
48. Rock Island Armory (Armscor), model 1911ATFS Tactical, .22LR caliber pistol, bearing serial number TCM046069;
49. Springfield Armory, model XDM Elite, 9mm caliber pistol, bearing serial number B7254012;

50. Glock GmbH, model 40 Gen4, 10mm caliber pistol, bearing serial number BGKX574;
51. Glock, model 45, 9mm caliber pistol, bearing serial number BMFE985;
52. Kimber, model Stainless LW, 9mm caliber pistol, bearing serial number KF85787;
53. Glock GmbH, model 19 Gen5, 9mm caliber pistol, bearing serial number BNSL142;
54. Glock GmbH, model 34 Gen5, 9mm caliber pistol, bearing serial number BHRD262;
55. Smith & Wesson, model SW22 Victory, .22 caliber pistol, bearing serial number UEA5504;
56. Sarsilmaz (SAR Arms), model K-12 Sport, 9mm caliber pistol, bearing serial number T1102-19BR00880;
57. Kel-Tec, model P17, .22LR caliber pistol, bearing serial number G3B91;
58. Rex, model Zero 1 S, 9mm caliber pistol, bearing serial number A06393;
59. Rex, model Zero 1 S, 9mm caliber pistol, bearing serial number A08896;
60. Rex, model Zero 1 CP, 9mm caliber pistol bearing serial number A22679;
61. Sig Sauer, model P226, 9mm caliber pistol, bearing serial number 47E029110;
62. Rex, model Zero 1 S, 9mm caliber pistol, bearing serial number A04495;
63. STI (Taran Tactical), model 2011, 9mm caliber pistol, bearing serial number TX13040;
64. Kel-Tec, model P17, .22LR caliber pistol, bearing serial number G3C63;
65. CZ, model 75, 9mm caliber pistol, bearing serial number C953849;

66. CZ, model 75, 9mm caliber pistol, bearing serial number C898388;
67. IWI, model Masada, 9mm caliber pistol, bearing serial number M1000327;
68. Sig Sauer, model P320, 9mm caliber pistol, bearing serial number 58H077077;
69. Springfield Armory, model XDM-9 compact, 9mm caliber pistol, bearing serial number MG495748;
70. Glock GmbH, model 29 Gen4, 10mm caliber pistol, bearing serial number BDWR221;
71. Heckler & Koch (H&K), model USP Tactical, .40 caliber pistol, bearing serial number 22-102670;
72. Tangfolio, model Witness P Match, 10mm caliber pistol, bearing serial number MT44871;
73. Sig Sauer, model P320X5, 9mm caliber pistol, bearing serial number 58B275844;
74. Sarsilmaz (SAR Arms), model Sar 9, 9mm caliber pistol, bearing serial number T1102-17BV03866;
75. Fabrique National (FN), model Five-Seven, 5.7 x 28mm caliber pistol, bearing serial number 386282698;
76. CZ, model P-07, 9mm caliber pistol, bearing serial number C914488;
77. Springfield Armory, model XDM-9, 9mm caliber pistol, bearing serial number MG868487;
78. Springfield Armory, model XDM-10, 10mm caliber pistol, bearing serial number HM501465;
79. Glock GmbH, model P80, 9mm caliber pistol, bearing serial number BNLT574;
80. Glock GmbH, model 44, .22 caliber pistol, bearing serial number ADUN746;
81. Glock GmbH, model 32, .357 caliber pistol, bearing serial number PGZ263;

82. Sig Sauer, model P365, 9mm caliber pistol, bearing serial number 66A328840;
83. Sig Sauer, model P320X VTAC, 9mm caliber pistol, bearing serial number 58J060357;
84. Taurus, model TX, .22LR caliber pistol, bearing serial number 1PT031850;
85. Taurus, model Tracker, .22LR caliber pistol, bearing serial number FW669781;
86. CZ, model 75 P-01, 9mm caliber pistol, bearing serial number D318135;
87. Para Ordinance, model P16, .40 caliber pistol, bearing serial number SJ2051;
88. Springfield Armory, model XDM Elite, 9mm caliber pistol, bearing serial number BY342561;
89. Sig Sauer, model P226, 9mm caliber pistol, bearing serial number 47C025940;
90. Styr Arms, model L9-A2MF, 9mm caliber pistol, bearing serial number 3182508;
91. Sig Sauer, model P320, 9mm caliber pistol, bearing serial number 58H119294;
92. Rex, model Zero 1 T, 9mm caliber pistol, bearing serial number A16392;
93. Archon Arms, model Type B, 9mm caliber pistol, bearing serial number AA0001206;
94. Fabrique National (FN), model 519, 9mm caliber pistol, bearing serial number GKS0089977;
95. Glock GmbH, model 23C, .40 caliber pistol, bearing serial number NGD804;
96. Beretta, model APX, 9mm caliber pistol, bearing serial number A073486X;

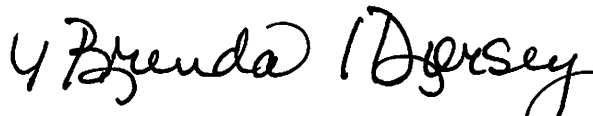
97. Smith & Wesson, model M&P9, 9mm caliber pistol, bearing serial number NEC9901;
98. CZ, model Shadow II, 9mm caliber pistol, bearing serial number D035762;
99. Hudson, model H9, 9mm caliber pistol, bearing serial number H10883;
100. Fabrique National (FN), model 509, 9mm caliber pistol, bearing serial number GK20033469;
101. Ruger, model Super Redhawk Alaskan, .44 magnum caliber pistol, bearing serial number 530-52625;
102. CZ, model 75B, 9mm caliber pistol, bearing serial number C837647;
103. CZ, model 75SP-01, 9mm caliber pistol, bearing serial number C560295;
104. Beretta, model M9A3, 9mm caliber pistol, bearing serial number BER772222;
105. Fabrique National (FN), model FNX-45, .45 caliber pistol, bearing serial number FX3U127816;
106. Glock GmbH, model 20 Gen4, 10mm caliber pistol, bearing serial number BLEG752;
107. Springfield Armory, model Hellcat, 9mm caliber pistol, bearing serial number AT231575;
108. Glock GmbH, model 17 Gen4, 9mm caliber pistol, bearing serial number BGTG335;
109. Glock GmbH, model 24, .40 caliber pistol, bearing serial number RXB322;
110. Heckler & Koch, model VP9L-V, 9mm caliber pistol, bearing serial number 238-002236;
111. Springfield Armory, model XDM Elite, 9mm caliber pistol, bearing serial number AT233031;
112. Fabrique National (FN), model FN 509, 9mm caliber pistol, bearing serial number GKS0097900;

113. Springfield Armory, 1911 RO Target, .45 caliber pistol, bearing serial number NM627818;
114. Smith & Wesson, model M&P 380 Shield EZ, .380 caliber pistol, bearing serial number NFK1944;
115. Sturm, Ruger & Co., Inc., model 10/22, .22 caliber rifle, bearing serial number 824-37437;
116. Sturm, Ruger & Co., Inc., model PC9 Carbine, 9mm caliber rifle, bearing serial number 910-06030;
117. Maverick Arms (Mossberg O.F. & Sons), model 88, 20 gauge shotgun, bearing serial number MV28236N; and
118. any and all magazines not otherwise specified.

C. Upon conviction of any of the offenses alleged in Counts 4 and 7 of this Indictment, **JORGE LUIS VILLARREAL** shall forfeit to the United States any property constituting or derived from any proceeds traceable to a violation of Title 18, United States Code, Section 924(n), including but not limited to \$44,881 in United States currency.

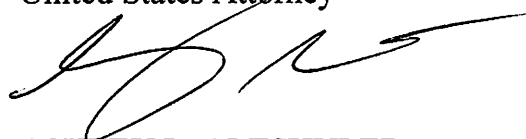
All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

TIMOTHY J. DOWNING
United States Attorney



ASHLEY L. ALTSHULER
WILSON D. McGARRY
STANLEY J. WEST
Assistant United States Attorneys